

CORRES CONTROL
OUTGOING 173 NO

93RF3006 **EG&G ROCKY FLATS**



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March 25 1993

James K Hartman

Transition and Environmental Restoration

DOE, RFO

Attn G Hail

POND C 2 RECYCLE PROJECT GHS-117 93

Due to unresolved issues concerning backflow prevention EG&G Plant Services (Utilities) continues to disapprove input of Pond C 2 recycled water into the plant raw water system At issue is the reliability of existing backflow preventers in truly preventing cross flow and potential cross contamination between the raw and domestic water systems This letter provides a summary of the outstanding issues discusses the options available to DOE RFO and provides recommendations capable of successfully resolving the outstanding concerns In light of the information presented EG&G Rocky Flats Inc requests direction from DOE RFO on how to proceed with the project

Issues

1 Utilities personnel will not approve any design which allows direct recycled water inputs to the Raw Water System until the backflow preventer issue is resolved However backflow Preventers are not an issue with Colorado Department of Health (CDH) in that they are approved devices which meet the statutory requirements for cross connection control

2 The option to supply Pond C-2 water for dedicated use at 881 Cooling Towers (CT) has been evaluated and is not feasible because of low usage

3 CDH and the City of Westminster have made it quite clear that direct discharge of Pond C 2 water to Woman Creek is unacceptable consequently they are adamant that Pond C 2 Recycle be pursued

4 Environmental Protection Agency (EPA) approval to discharge Pond C 2 to the Boomfield Diversion Ditch will expire December 31 1993 Future approval to continue this bypass is expected to be dependent on pursuit of the Pond C 2 Recycle Project

Both EPA and CDH have requested that Pond Water Management Interim Measures/Interim Remedial Action (IM/IRA) address recycle projects and Pond C 2 Recycle in particular Pond C 2 Recycle may become required under the IM/IRA Implementation Plan

CLASSIFICATION

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER

SIGNATURE

George H. Schack

W. H. H.

DATE

3/26/93

IN REPLY TO RFP CC NOS

ACTION ITEM STATUS

☐ OPEN ☐ CLOSED

☐ PARTIAL

LTR APPROVALS

W. H. H.

ORIG & TYPIST INITIALS

ADMIN RECORD

A-0005-000403

Options

- 1 Resolve Utilities concern by permanently separating the Domestic and Raw Water Systems via construction of a new second raw water pond Continue with Pond C-2 Recycle design stage but delay construction to late FY94 to parallel the new pond construction This option requires expedited funding (\$900 000) and design of the new raw water pond project
- 2 Postpone project pending completion of the IM/IRA process This can be justified on the basis of the requirement to ensure IM/IRA implementation actions are consistent with future Operable Unit (OU) remedial actions This option also allows EG&G to evaluate/resolve potential repairs to the C-2 dam or changes to Pond C 2 level operating range resulting from the recent COE dam inspection report Agency objections (to the postponement) are unknown but can be expected
- 3 Proceed with final design stage as currently configured This will require upper EG&G management and/or DOE to override Utilities objections in order to proceed with construction and operation of the system
- 4 Cancel project and resume historic discharge to Woman Creek This will require DOE to renege on certain aspects of the Agreement in Principle (AIG) and will force EG&G/DOE to adopt a position contrary to the express wishes of the agencies and local communities

Recommendations

The first option is the only option that permanently resolves the backflow prevention issue This option has the added benefit of making the raw water system available to other clean effluents such as those from the 374 Evaporator 910 Evaporators or future OU remedial actions This option also demonstrates progress toward reducing downstream discharges a commitment made by DOE under the AIG

The second option is also viable Assuming Pond C 2 water maintains its historic high quality there should be no technical reason why this water can not be released downstream obviating the need for an expensive recycle system At a minimum this option allows for more time in which to fully investigate discharge/recycle alternatives under the IM/IRA process At best the IM/IRA process will justify canceling the project in favor of routine downstream discharge based on compliance with applicable standards

Option three demonstrates immediate progress towards completion of the project but does not solve the backflow prevention issue and creates an adversarial relationship among internal RFO organizations Although technically justifiable and legal under our current permit option four adopts an adversarial posture with the regulators with unknown consequences

James K Hartman
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EG&G is prepared to pursue whichever alternative(s) is selected by DOE RFO We request guidance to allow EG&G to plan future actions and focus efforts to achieve an integrated Surface Water Management Program

If you have any questions concerning the project please contact Eric Mende at extension 8594


George H Setlock Director
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EG&G Rocky Flats Inc

EWM:fm

Orig and 1 cc J K Hartman